

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES

v.

ANTHONY BUCCI

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No. 04-cr-10194-RCL

**MOTION TO AMEND CONDITIONS OF RELEASE FOR
PRE-TRIAL PREPERATION AND DURING TRIAL**

The defendant, upon the March 9, 2006 suggestion of Chris Wylie of Pre-trial Services, respectfully moves the Court to amend the conditions of his release in a manner similar to those allowed in United States v. Paul A. DeCologero, 01-cr-10373-RWZ [RICO, cocaine trafficking, Hobbs Act robberies, murder of government witness] for weekday and weekend activities outside of his home exempt from electronic monitoring between the hours of 8:00 am thru 9:00 pm within the Commonwealth of Massachusetts n.1/.

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n.1/ Not only for the purpose of going to defense counsel's office, but also for a plethora of other activities such as public libraries, law libraries (public, private and Federal Courthouse), Attorney Anthony Rossi's Office (library, research, copying and defense team consultation, Court archives, defense case related locations (for photographing and travel time measurement), public record facilities, government Agencies and Departments, as well as many other strictly legitimate and legal business locations, id.

The defendant has not had any adverse incidents during the past eighteen months and, exclusively because he was a government cooperator, and for no other legitimate reason, co-defendant Jon Minotti was allowed weekday and weekend unrestricted activities outside his home between 8:00 am and 10:00 pm. The defendant's active participation is necessary for counsel to secure acquittal and justice with Anthony Bucci's assistance preparing to present extremely strong affirmative defenses and the multiple attacks on the government's unreliable false witnesses. All cooperating witnesses are incarcerated.

Anthony Bucci
By his attorney,

/s/Michael F. Natola

March 10 , 2006

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing affidavit has been served the above date, electronically, upon Assistant U.S. Attorney John T. McNeil.

/s/ Michael F. Natola

MICHAEL F. NATOLA